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ROHM HAAS COMPANY

March 22, 1971

Mr. Gus J. Bennett, Director of Enforcement and Standards
Environmental Protection Agency
26 Federal Plaza
New York, New York

Dear Mr. Bennett:

Pursuant to our discussions in Philadelphia on March 17th, we are attaching hereto copies of various reports from our research and development groups. These reports bear on our efforts over the past several years to improve or modify our Whitmoyer processes in the interests of reducing residues, improving yields and, where appropriate, providing recycle features to the process. You recognized in our Philadelphia discussions that much of the material contained in these reports is proprietary and represents trade secrets which we wish to withhold from competitors. In making these disclosures, we are relying upon your assurance that you will not disclose this information to persons outside your agency.

In reviewing these reports, it should be borne in mind that much of the subject matter deals with efforts to improve the economy of the operation. We did not then, nor do we now, feel that our methods of disposal since 1965 constitute any hazard to the environment. It is important to recognize, however, that if environmental considerations had been the moving force in our research and development studies, then the studies would have undoubtedly followed the same course.

In chronological order, the reports attached hereto are as follows:

Sept. 28, 1966 - ("Arsenical Acid; Production at High (175°C) Temperature" by D. O. Nicodemus)

This report summarizes discussions which were held to review a proposed major process revision which gave promise of substantially improving the conversion or arsenic to saleable products (and, obviously, reducing the output of arsenic wastes). This process modification was fully integrated into our Whitmoyer operations in 1966-67.

March 20, 1967 - ("Arsanilic Acid Process Modification - Solvent Process" - by S. Wise and H. Raterink)

This process modification was introduced into our Whitmoyer operations, but further experience led to even simpler techniques for accomplishing the same benefits and these are now part of our standard manufacturing operations.

AR100178

AR100173

May 13, 1968 - ("....Concentration of Wastes" - by D. O. Nicodemus)

This report covers laboratory studies on the concentration of the liquid wastes; it concluded that this was uneconomical. (Even if practiced, this would have reduced only the quantity of water; the quantity of arsenic in the liquid wastes would have remained unchanged.)

May 22, 1968 - ("Arsanilic Acid Wastes...and Washes" - by D. O. Nicodemus)

This study was an effort to reduce the liquid waste by a recycle operation. However, when this was attempted on a plant scale, it was found that the strict FDA specification relating to the arsenite content of our finished product could not be met and it was necessary to abandon the scheme.

July 2, 1968 - ("Recovery of Products from the Aniline Still Tars" - by D. O. Nicodemus)

This was an effort to further process our still residues (the so-called "solid waste") in order to recover arsenical values. The study showed that the only practical method of recovery failed to recover more than 14% of the contained arsenic. An economic analysis showed this to be unattractive. Even if the primary purpose had been to recover arsenic because of concern over the environment, this scheme would still have left untouched 86% of the contained arsenic.

We believe that these reports will testify to the considerable amount of effort which has been expended in attempts to improve our arsenical processes. We are still continuing these efforts as new ideas come forth.

Very truly yours,

ROHM AND HAAS COMPANY

D. W. Kenny
Vice President
Manager, Engineering Division
Licensing Department
Environmental Control

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